

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

Civil Action No. 04-12011-MLW

CARLOS A. AGUIAR,     )  
                    Plaintiff     )  
                                   )  
                    v.             )  
                                   )  
LIMA & CURA FISHING     )  
CORPORATION,             )  
                    Defendant     )

**DEFENDANT'S OBJECTION TO PLAINTIFF'S EXHIBITS**

The defendant objects to the following exhibits:

1. N: National Vital Statistics Reports, United States Life & Life Expectancy Tables and O: Department of Housing, Poverty guidelines.

Relevancy, foundation, inaccuracy. Additionally, the defendant hasn't precisely identified (or provided) what poverty guidelines the plaintiff proposes to introduce or what portions of the vital statistics report sought to be introduced.

2. R: Written demands for Maintenance & Cure Benefits.

Since cure has been paid maintenance has been paid, then the only dispute is as to the rate of maintenance. Any such demands are irrelevant.

3. X: Recorded interviews and transcripts thereof of crewmembers Abreu, Machado, Lima and Cura.

The defendant reserves objections on any portions of these documents that may be offered if they are offered by the plaintiff inasmuch as it would be hearsay.

4. Y: Recorded Interview and Transcript thereof of the plaintiff.

The defendant objects only if they are offered by the plaintiff inasmuch as it would be hearsay if offered by the plaintiff as opposed to an admission offered by the defendant.

For the Defendant,  
By its Attorneys,

**REGAN & KIELY LLP**

/s/ Joseph A. Regan  
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